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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

DIAL PAGE, INC.
ECHO GROUP, L.P.
PACTEL PAGING
PACTEL PAGING
PAGEMART, INC.

)
) ET Docket No. 92-100
) PP-35
) PP-36
) PP-38
) PP-39
) PP-40
)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**COMMENTS OF MOBILE TELECOMMUNICATION
TECHNOLOGIES CORPORATION**

Mobile Telecommunication Technologies Corporation ("Mtel"), by its attorneys, hereby submits its comments on the above-captioned requests for pioneer's preferences.¹ Throughout the past year, numerous parties have filed petitions for rulemakings and pioneer's preference requests pertaining to new advanced messaging services in the 930-931 MHz band. In anticipation of a possible Notice of Proposed Rulemaking to address these various pending requests, the Commission issued public notices: (1) requesting comment on the pending petitions for rulemaking; (2) requesting comment on the existing pioneer preference requests; and, (3) establishing a June 1, 1992, cut-off for the filing of additional

¹ Requests for Pioneer's Preference Filed, *Public Notice*, Mimeo No. 22915 (April 30, 1992). See also *Dial Page, Inc. Petition for Rulemaking for Amendment of the Table of Frequency Allocations and Part 22 of the Rules Relative to the Allocation of Reserve Spectrum for a Common Carrier Acknowledgement Paging Service*, PP-35 (filed October 11, 1991) ["Dial Page APS Request"]; *Echo Group L.P. Request for Pioneer's Preference*, PP-36 (filed July 30, 1991) ["Echo MRDS Request"]; *Request of PacTel Paging for a Pioneer's Preference Respecting the Advanced Architecture Paging Service*, PP-38 (filed August 2, 1991) ["PacTel AAP Request"]; *Request of PacTel Paging for a Pioneer's Preference Regarding Ground-to-Air Paging Service*, PP-39 (filed October 15, 1991) ["PacTel GAP Request"]; and *Pagemart, Inc. Request for a Pioneer's Preference Regarding its Petition for Rulemaking to Allocate 800 kHz in the 930-931 MHz Band and To Establish Rules and Policies for a New Nationwide & Local Personal Information Messaging Service*, PP-40 (filed March 19, 1992) ["PageMart PIMS Request"].

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pioneer's preference requests and "demonstration[s] of technical feasibility or preliminary experimental results required to be filed as part of [a] request."² Unfortunately, the initial deadline for commenting on the pending pioneer's preference requests falls on June 1, 1992, the same date that each party will be filing initial experimental results or technical feasibility studies.

Mtel has serious doubts whether the above-captioned applications meet the Commission's threshold requirements for grant of a pioneer's preference. In such respects, however, the technical feasibility submissions due June 1, 1992, may permit more informed comment. Accordingly, Mtel will defer addressing the merits of each proposal until the June 15, 1992, reply deadline, which will afford an opportunity to review the technical feasibility studies.

Respectfully submitted,

By: R. Michael Senkowski
Richard E. Wiley
R. Michael Senkowski
David E. Hilliard
Eric W. DeSilva
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7000

Dated: June 1, 1992

² See Petitions for Rulemaking Filed, *Public Notice*, Mimeo No. 22914 (April 30, 1992) (soliciting comment on 930-931 MHz petitions); Requests for Pioneer's Preferences Filed, *Public Notice*, Mimeo 22915 (April 30, 1992) (soliciting comments on pioneer's preferences); Deadline To File Pioneer's Preference Requests 900 MHz Narrowband Data and Paging Service (ET Docket No. 92-100), *Public Notice*, Mimeo 22922 (April 30, 1992) (establishing June 1, 1992, cut-off for 930-931 MHz pioneer's preference requests).

CERTIFICATE OF SERVICE

I, Kim Riddick, hereby affirm that on this 1st day of June, 1992, I have caused copies of the foregoing "Comments of Mobile Telecommunication Technologies Corporation" to be delivered, First Class Mail, postage pre-paid, to the following, except where service by hand is indicated:


Gerald S. McGowan *
Majorie J. Giller
Lukas, McGowan, Nace & Gutierrez, Chtd.
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006
Counsel to Dial Page, L.P.

Thomas J. Casey *
Jay L. Birnbaum
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005
Counsel to Echo Group, L.P.

Mark A. Stachiw
PacTel Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, Texas 75271

Carl W. Northrop *
Bryan, Cave, McPheeters &
McRoberts
703 13th Street, N.W.
Washington, D.C. 20005-3960

Jeffrey Blumenfeld *
Glenn B. Manishin
F. Thomas Tuttle
Blumenfeld & Cohen
1615 M Street, N.W., Suite 700
Washington, D.C. 20005
Attorneys for PageMart, Inc.


Kim Riddick

* - indicates service by hand